

### **REMARKS**

Claims 1 and 6-18 are pending in the patent application. The Examiner has rejected Claims 1 and 6-18 under 35 USC 103(a) as unpatentable over Boyle, et al in view of Coffee.

Applicant maintains the contention that the Boyle patent does not teach or suggest all of the features of the pending claims. The present application teaches and claims an apparatus and method for serving data employs a web server and a communications interface operable to enable the web server to send and receive messages on a wireless digital packet network, to act as a wireless web server. A method of serving data involves receiving a data request message from a wireless digital packet network, requesting data from a wireless web server in response to the data request message and transmitting on the wireless digital packet network a response message including data produced by the wireless web server in response to the data request message. A method of requesting data from a server involves transmitting a message on a wireless digital packet network for use by a wireless web server operable to receive messages from the wireless digital packet network.

Transmitting the message may involve producing a wireless digital packet network message containing a Transmission and Control Protocol/Internet Protocol (TCP/IP) message. The method may further involve receiving, from the wireless digital packet network, a message produced by the wireless web server.

Applicant respectfully maintains that the Boyle patent does not teach or suggest a wireless server; but, rather, teaches a link station for directly connecting to the server and for wirelessly communicating with the gateway and/or handheld devices to communicate server information thereto. The Boyle patent is directed to methods for pushing and pulling data in a computer network. Data are pushed from a source to a destination via an intermediate computer system. With reference to Fig. 1, the intermediate computer system, link station 124, relays a user request to a server 130.1 and then transmits the server response to the user, directly to handheld device 120.2 or through a gateway 126 of a wireless network 125 to handheld device 120.1. The link station provides a browser proxy function and a messenger function for handling the communications (i.e., requests and responses).

The Boyle patent does not teach or suggest that the server can communicate wirelessly, or that the server has a built-in communication interface for conveying internet messages to and from the server using a wireless digital packet network. Rather, Boyle requires the link station to receive the server responses, convert them as necessary, and transmit them to the user destinations. The only wireless connection in Boyle is between the link station and the wireless network. Boyle neither teaches nor suggests a wireless web server with a wireless communications interface.

The Examiner acknowledges on page 2 of the present Office Action that "Boyle et al do not specifically disclose a wireless web server" (page 4 of the OA) and has cited the Coffee patent publication (hereinafter "Coffee") as teaching a wireless server. The Examiner points to reference numeral 21 of Fig. 1 of Coffee.

Coffee teaches a network system for tracking remotely-located employees and company assets through wireless communications with wireless devices, including phones, pagers, tracking devices, etc. Communications from the remotely located wireless devices are received at a wireless gateway 20. As taught in paragraph [0112],

"wireless gateway 20 (Fig. 1) consists of wireless network servers and message routers 21". Coffee's wireless gateway is not a wireless web server. Coffee's wireless gateway is an interface to a network that includes web servers. As shown in Fig. 4, physical connections are made between a message router 36 and the customer interface server (CIS) 29, which is in turn physically connected to the Customer Web Server 22. The web servers are not communicating wirelessly, but are hardwired to send communications to other servers and the wireless gateway.

Applicant notes that Coffee teaches that "the architecture of...21...is shown in block diagram form in Fig. 3." Fig. 3 shows the gateway having wireless communications capability as well as wired communications links (at 61). The software components in the gateway are message tagging, queuing and routing applications. The gateway is clearly not a web server and is clearly connected to provide wired communications to the web servers.

Applicant further notes that Coffee expressly teaches, at paragraphs [0172-0179], that the CIS server has a connectivity manager 54 for "providing the mechanism for TCP/IP connection". Coffee explicitly stated earlier in the patent publication, at paragraph [0132], that TCP/IP "is not

an efficient protocol for wireless systems". Coffee expressly teaches that the web server communications are not appropriate for wireless transmissions. Further, Coffee expressly teaches that the communications between the web servers and the wireless gateway are not wireless communications. The wireless gateway communicates wirelessly with the tracking subsystem, but is hardwired for communications with the servers.

Applicant respectfully asserts that the Coffee patent publication does not provide those teachings which are missing from the Boyle patent. Coffee teaches a wireless gateway for handling wireless communications with remotely-located devices. Coffee's gateway is physically connected to a network of web servers that handle the messages which the Coffee gateway converts, queues and sends to the servers. Coffee does not teach or suggest a wireless web server.

For a determination of obviousness, the prior art must teach or suggest all of the claim limitations. "All words in a claim must be considered in judging the patentability of that claim against the prior art" (In re Wilson, 424 F. 2d 1382, 1385, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970)). If the cited references fail to teach each and every one of the

claim limitations, a *prima facie* case of obviousness has not been established by the Examiner. Since the Boyle patent does not show each and every feature of the claimed invention, and since the Coffee patent publication does not teach the claim features which are missing from Boyle, a *prima facie* case of obviousness cannot be sustained.

Based on the foregoing, Applicant respectfully requests that the rejection based on 35 USC § 103 be withdrawn and that Claims 1 and 6-18 be passed to issuance.

Respectfully submitted,  
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